

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

WINKLEVOSS CAPITAL FUND, LLC,

Plaintiff,

v.

CHARLES SHREM,

Defendant.

Case No. 18-cv-8250 (JSR)

**NOTICE OF MOTION TO
QUASH**

PLEASE TAKE NOTICE that non-party Tyler Meade, Esq., by and through his undersigned counsel, Meade Firm p.c., respectfully requests an order quashing a subpoena to testify at a deposition served by Defendant Charlie Shrem on Tyler Meade, Esq., counsel to party Winklevoss Capital Fund, LLC.

This motion to quash is brought on the basis of the reasons stated in the accompanying memorandum of law in support of motion to quash and the declaration of Tyler Meade, with supporting exhibits.

On March 29, 2019, the parties and the non-parties held a telephonic conference with the Court. The Court subsequently ordered non-party Tyler Meade, Esq., to file this Motion to Quash by midnight on April 1, 2019. The Court further ordered Defendant to file an opposition to the Motion to Quash by midnight on April 8, 2019, with non-party Tyler Meade to reply to the opposition by midnight of April 12, 2019.

WHEREFORE, non-parties Tyler Meade, Esq., respectfully request this Court enter an order quashing Mr. Shrem's subpoena on the basis that a subpoena to testify at a deposition served upon party counsel is highly disfavored, the information sought has been received and is

available via less intrusive means, and the proposed topics to be covered are irrelevant, overbroad, harassing, and unnecessarily intrusive upon attorney-client confidentiality and attorney work-product.

The movant requests such other and further relief as the Court deems just and proper.

DATED: April 1, 2019

Respectfully submitted,

By: */s/ Tyler Meade*

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